

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNDER SEAL

In the Matter of the Search of:

Case Number: 21 CR 316

the three Trak4 vehicle tracking devices and associated equipment, further described in Attachment A

SEARCH AND SEIZURE WARRANT

To: Holly Groff and any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Northern District of Illinois:

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal:

See Attachment B

YOU ARE HEREBY COMMANDED to execute this warrant on or before June 7, 2021 in the daytime (6:00 a.m. to 10:00 p.m.).

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the issuing United States Magistrate Judge.

Date and time issued: May 24, 2021 at 1:40 p.m.



Jeffrey Cummings
Judge's signature

City and State: Chicago, Illinois

JEFFREY CUMMINGS, U.S. Magistrate Judge
Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No: _____ Date and Time Warrant Executed: _____ Copy of Warrant and Inventory Left With: _____

Inventory made in the presence of:

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

*Executing officer's signature**Printed name and title*

ATTACHMENT A

DESCRIPTION OF ITEM TO BE SEARCHED

Three gray rectangular boxes each with six small screws affixed to the back of the devices. One gray device has a sticker affixed to the back and bears IMEI number 015058000389164, as depicted below. One gray device is partially deconstructed bearing IMEI number 015058000263369. One yellow rectangular metal device with five black antennae. The items are depicted in the photographs below:





ATTACHMENT B

LIST OF ITEMS TO BE SEIZED

Evidence and instrumentalities concerning violation of Title 18, United States Code, Sections 875(c) and 2261A:

1. One gray Trak4 vehicle tracking device with no visible IMEI or serial number.
2. One partially deconstructed gray Trak4 vehicle tracking device bearing IMEI number 015058000263369.
3. One gray Trak4 vehicle tracking device with sticker bearing IMEI number 015058000389164.
4. One rectangular metal yellow device with five black antennae.
5. Any and all electronic data contained on the Subject Devices and associated equipment.

ADDENDUM TO ATTACHMENT B

Pursuant to Rule 41(e)(2)(B) of the Federal Rules of Criminal Procedure, this warrant authorizes the removal of electronic storage media and copying of electronically stored information found in the premises described in Attachment A so that they may be reviewed in a secure environment for information consistent with the warrant. That review shall be conducted pursuant to the following protocol:

The review of electronically stored information and electronic storage media removed from the premises described in Attachment A may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth in Attachment B;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth in Attachment B (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth in Attachment B; and
- d. opening or reading portions of files, and performing key word searches of files, in order to determine whether their contents fall within the items to be seized as set forth in Attachment B.

The government will return any electronic storage media removed from the premises described in Attachment A within 30 days of the removal unless, pursuant to Rule 41(c)(2) or (3) of the Federal Rules of Criminal Procedure, the removed electronic storage media contains contraband or constitutes an instrumentality of crime, or unless otherwise ordered by the Court.